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CPT Evaluation and Management Work Group

CPT Evaluation and Management Services

- Review Work Process
- Concept of Total Physician Work
- New E&M Structure
- Importance of Clinical Examples
- Role of Advisors
- Next Steps

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CPT Evaluation and Management Work Group

Work Group Composition

- CPT Editorial Panel
- CPT Advisory Committee
- RUC expertise
- CMS
- Medicare CMD
- Commercial CMD
- Other specialties

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Work Plan

- Meetings of the work group
- Written and oral testimony from specialty societies, state medical societies and individual physicians
- Survey of CPT users

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Work Plan

- Develop mission statement and principles to guide work
- Develop a list of options and consider the strengths and weaknesses of alternate approaches
- Have a report to the Editorial Panel by August of 2002

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Mission

- Develop a coding system that physicians can use to report their services while practicing medicine according to the needs of the patient.

"Total Physician Work":
The combination of medical decision making, clinically appropriate history and examination, and the time needed to evaluate and care for a patient.

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Principles for E&M Coding

- The system should be easy to understand and use by physicians, payers and beneficiaries
- Definitions of codes should be clinically meaningful and describe clearly differentiated services
- There should be consistency between code families

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Principles for E&M Coding

- ❖ Choice of a code should be simple, and should reflect the total physician work involved in an evaluation and management service
- ❖ The system should allow physicians maximum flexibility in demonstrating the level of work involved in a service
- ❖ The system should be usable by all physicians, regardless of specialty

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Principles for Coding Revisions

- ❖ Physicians should not suffer a reduction in reimbursement from implementation of an improved and simplified coding system for evaluation and management services
- ❖ The coding system should reflect contemporary medical practice

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Problems with E/M Codes

- ❖ Structure of Codes
 - ❖ 3 or 5 levels of service with 4 levels of history, examination, decision-making
- ❖ Rules for Code Use
 - ❖ 3/3 criteria for some codes, 2/3 for others and time as a secondary criterion

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Components of Physician Work in an E/M Service

- ❖ History taking
- ❖ Examination
- ❖ Review of data
- ❖ Medical Decision-making, including coordination of care
- ❖ Shared decision-making with patients
- ❖ Counseling

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Starting Assumptions

- ❖ The existing code descriptors are excessively prescriptive for amount of history, physical and examination involved in a service.
- ❖ Evolution of practice has changed how physicians do their work; for the same service it is reasonable to expect that there may be varying amounts of history or examination needed to make decisions.
- ❖ Flexibility needed: "Total physician work"

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Suggested Solutions

- ❖ Maintain the status quo but change documentation guidelines
- ❖ Develop time-based counseling codes
- ❖ Develop a three-tiered approach to code selection
- ❖ Create a single E/M code

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Suggested Solutions

- Revise New/Established codes and create a modifier for consultations
- Create a mechanism of demonstrating the complexity of a patient regardless of the code type
- Use outlier analysis as basis for audits

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Suggested Solutions

- Reduce the number of levels of service to three, or perhaps, four
- Create global periods for E/M services
- Maintain current levels but revise descriptors and rules for code selection to allow maximum flexibility in choice of code

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Coding Errors Research Findings

- Concordance between coding experts is low (kappa scores of 0.3)
- But, disagreement is never more than one level off
- There is a natural distribution of codes by physicians
- Over-coding is balanced by under-coding

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Changes in Medical Practice

- More patients have multiple chronic conditions which require considerably more work in the context of an evaluation and management service; this work may be less examination and more decision-making by the physician

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Research Method

- 289 interviews from initial pool of 750 physicians

| | |
|--------------------------|-----|
| ■ Group practice | 48% |
| ■ Solo/2-person practice | 30% |
| ■ Hospital-based | 20% |
| ■ Academic practice | 2% |

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Research Findings

- >60% of respondents found clinical examples very useful and used them
- Medical decision-making & examination are used more often in choice of code
- Time used by about 40% of physicians
- Only 20% of users think the instructions for code selection are clear
- 1/3 use "my own criteria" for selection

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Proposed Solution

- Maintain current levels but revise descriptors and rules for code selection to allow maximum flexibility in choice of code
 - Problems with "time" need to be resolved

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New E&M Structure

- Descriptors based on concept of total physician work
- Reference level codes have been developed for each code family at level three and level five (for code families with 5 levels)
- Clinical examples for reference level codes will guide code selection

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New E&M Structure

- Confirmatory consultation codes eliminated
- In-patient follow-up consultation codes eliminated
- Concurrent care codes adopted for inpatient setting
- Nursing home code revisions

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Importance of Clinical Examples

- The clinical examples must accurately represent common patients and conditions and the total physician work involved in providing the service
 - Examples should reflect the differences in work for a new and established patient at the same level of service
 - Examples should clearly show the difference in work between a level three and level five service

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Importance of Clinical Examples

- The clinical examples should not describe a standard of care, but what is common and usual for a specialty
- If a specialty sees patients with multiple chronic conditions requiring considerable effort in decision-making and patient management, these examples should be developed

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Next Steps

- Specialty societies develop clinical examples for reference codes, starting with office services
- Decisions re: time as part of descriptors
 - Include or exclude?
 - Intra-service time only or total time?
 - Leave as is or restate?

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